

June 16, 2023

VIA ECF

The Honorable Louis L. Stanton
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl St., New York, NY 10007-1312

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, 1:22 Civ 02435 (LLS)(SN)

Dear Judge Stanton:

We represent Defendants Tracy Wolff, Entangled Publishing, Macmillan, and Universal City Studios, and write pursuant to Rule 3.B of Your Honor's Individual Practices regarding filing redacted documents under seal and in connection with the parties' Protective Order (ECF No. 50) and the Second Circuit's opinion in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Defendants filed under seal Exhibit A to their June 16, 2023 letter. This exhibit is a 2011 draft of Plaintiff's unpublished manuscript, which she has produced in discovery and marked confidential. Defendants are filing the manuscript under seal to protect Plaintiff's purported confidentiality interest but note that this document has allegedly been registered with the Copyright Office, meaning it is publicly available. Further, Defendants reserve the right to request that the manuscript be unsealed if Plaintiff takes an action that waives confidentiality and would not object to unsealing Exhibit A.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

By: /s/ Benjamin S. Halperin

COWAN, DEBAETS, ABRAHAMS &
 SHEPPARD LLP
 Nancy E. Wolff
 Benjamin H. Halperin
 CeCe M. Cole
 41 Madison Avenue, 38th Floor
 New York, New York 10010
 Tel: (212) 974-7474
 Fax: (212) 974-8474
nwolff@cdas.com
bhalperin@cdas.com
ccole@cdas.com

Attorneys for Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, and Universal City Studios LLC

Cowan, DeBaets, Abrahams & Sheppard LLP

41 Madison Avenue
 38th Floor
 New York, NY 10010

9454 Wilshire Blvd
 Suite 901
 Beverly Hills, CA 90212

cdas.com